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**From:** Lundelius, Diana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=998193F6F9904EA4AB438772B62DD7EA-LUNDELIUS, DIANA]  
**Sent:** 8/9/2019 4:15:26 PM  
**To:** Frigerio, Lorry [Frigerio.Lorry@epa.gov]  
**CC:** Ruple, Rhonda [ruple.rhonda@epa.gov]  
**Subject:** Action Needed by 8/20: CCDS/Environmental Benefit calculations for SN OPERATING-2018 EAGLE FORT FLYOVER-HAUSSER D, G, J SITES  
**Attachments:** SN Operating-3 Sites-Env Benefits Calcs.xlsx; Pages from Hausser D SP Application Submitted.pdf; Pages from Hausser G Pad - PBR Application.pdf; Pages from Hausser J Pad - NRSP Application.pdf; SN Operating AOC Enclosure.pdf; Pages from Executed SN Operating AOC Transmittal.pdf; CCDS - Appendix A of Guidance updated March FY14\_SN Operating.pdf

Here are the calculations and support documents, and the completed case conclusion data sheet. The reductions were estimated based on permit application representations for the affected emission sources seen in the flyover videos, and the dates of corrective action completion furnished for the AOC. We believe the calculations and the basis for estimates follow the established guidance. We requested but did not receive any cost information from the company for implementing corrective actions.  
Diana

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**From:** Frigerio, Lorry <Frigerio.Lorry@epa.gov>  
**Sent:** Tuesday, August 06, 2019 4:30 PM  
**To:** Lundelius, Diana <Lundelius.Diana@epa.gov>  
**Cc:** Zequeira, C <Zequeira.C@epa.gov>; Ruple, Rhonda <ruple.rhonda@epa.gov>; Nicholson, Timothy <Nicholson.Timothy@epa.gov>  
**Subject:** Action Needed by 8/20: CCDS/Environmental Benefit calculations for SN OPERATING-2018 EAGLE FORT FLYOVER-HAUSSER D, G, J SITES

Greetings –

By way of introduction, I work in OECA's Office of Compliance and I'm responsible for performing quality reviews of estimated Environmental Benefits calculations resulting from enforcement actions for "big cases".

As outlined in the following SOP, OECA conducts quality reviews of environmental benefits calculations for lodged cases with amounts estimated at or above 5 million units (e.g., pounds, gallons, cubic yards) and air toxics cases with 200,000 lbs. or more of emissions reductions. These thresholds are considered "big cases". The SOP is found here: <http://intranet.epa.gov/oeca/oc/pmod/ebsop.pdf>

In order to conduct this quality review, I am requesting that you provide the Case Conclusion Data Sheet and the underlying environmental benefits calculations for the below-listed case. The CCDS form is found in Appendix A of the CCDS Guide, also attached here.

While ICIS identifies you as the Lead EPA Technical Contact, I am also copying the Lead EPA Attorney listed in ICIS just in case there have been any changes in the leads.

Kindly send me the requested information by August 20<sup>th</sup>. If you have any questions or concerns, please don't hesitate to contact me at your earliest convenience.

Best regards,

Lorry Frigerio

Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
202-564-4931



Reg.	Enforcement Action Identifier	Final Order No.	Final Order Name	Primary Law	Primary Law Section	Final Order Date	Updated Date	Final Order Type Code	Estimated Air Pollutants Reduced, Treated, or Eliminated (pounds)	Estimated Water Pollutants Reduced, Treated, or Eliminated (pounds)	Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds)	Total Estimated Pollutants Reduced, Treated, or Eliminated (pounds)	Multiregional	Court Docket Number
06	06-2019-3342	1	SN OPERATING-2018 EAGLE FORT FLYOVER-HAUSSE D. G. J SITES- AOC_1407	CAA	173	07/08/2019	7/10/2019	ACO	8,903,939	0	0	8,903,939	No	

Quantitative Environmental Impact List						
Pollutants	Amount	Units	Media	Process	Environmental Benefit Note	
Reduction of Ongoing Releases						
☐ Reduction-Source Reduction						
<input checked="" type="checkbox"/> Hydrogen sulfide	422,525.00	Pounds	Air	2019 - Energy Extraction - Land Based Gas Extraction & Production	Estimated Air Pollutants Reduced, Treated, or Eliminated (pounds)	
<input checked="" type="checkbox"/> VOLATILE ORGANIC COMPOUNDS (VOCs)	8,481,014.00	Pounds	Air	2019 - Energy Extraction - Land Based Gas Extraction & Production	Estimated Air Pollutants Reduced, Treated, or Eliminated (pounds)	